

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SLOBODAN PRALICA)	
)	
)	TRIAL BY JURY DEMANDED
Plaintiff,)	
)	
v.)	
)	
BETA ELECTRIC, INC., SABID REDZIC)	
And BEKIM REDZIC)	
)	
Defendants.)	

COMPLAINT

JURISDICTION AND VENUE

1. This is a suit to recover back wages and liquidated damages. Federal question jurisdiction is posited upon Title 28 U.S.C. 1331 and Title 29 U.S.C. 216(b), commonly known as the “Fair Labor Standards Act” (hereinafter “FLSA”), as amended, for violation of the maximum hours provisions of §207(a)(1). The court has supplemental jurisdiction over the claims under the Illinois Wage Payment and Collection Act claim, 820 ILCS 115/11(-c) and the Illinois Minimum Wage Law, 820 ILCS 105/1-15, pursuant to the Judicial Improvements Act, 28 U.S.C. 1367(a)(1). The unlawful conduct occurred in this district at or near Lincolnwood, Illinois.

STATEMENT OF CLAIM

2. Plaintiff was employed by defendants as an electrician between about August 1, 2011 and September 10, 2013, at a regular rate of \$25.00 per hour. During the time employed, plaintiff worked approximately five to 20 hours beyond 40 hours per week in most work weeks for which he was willfully not compensated wages at the rate

of one and one-half times his regular rate of pay (\$37.50/hr.), in violation of 29 U.S.C. 207(a), the ILMWL, 820 ILCS 105/4a, and the One Day Rest in Seven Act, 820 ILCS 140/2 (2015).

3. The individual defendants are an “employer” of the plaintiff within the meaning of 29 U.S.C. 203(a) and (d). The individual defendants are officers of, and operate, manage and control BETA ELECTRIC, INC., in Lincolnwood, Illinois. SABID REDZIC is the president of the corporation and BEKIM REDVIC is a manager who collected plaintiff’s time sheets. Both, on a daily basis, directly and indirectly managed and directed the enterprise and recorded the excess hours, willfully knowing they were violating the FLSA, from having been sued recently in prior similar litigation regarding maximum hours issues. As a result thereof, there is now due to plaintiff from defendants, jointly and severally, all back wages, liquidated damages, attorney’s fees and costs of the action, as provided by 29 U.S.C. 216(b) and 820 ILCS 105/12a (2008).

PRAYER FOR RELIEF

WHEREFORE plaintiff asks the court to enter judgment in his favor, and against the defendants for all back wages due, plus liquidated damages, attorney’s fees and costs of the action due, and all relief provided by 29 U.S.C. 216(b); 820 ILCS 105/12a (2008); and the Illinois Wage Payment and Collection Act, 820 ILCS 115/11(c).

/s/ Ernest T. Rossiello

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